

UNITED STATES DISTRICT COURT
65
FOR THE SOUTHERN DISTRICT OF NEW YORK

VIACOM INTERNATIONAL, INC., COMEDY)
PARTNERS, COUNTRY MUSIC)
TELEVISION, INC., PARAMOUNT)
PICTURES CORPORATION, and BLACK)
ENTERTAINMENT TELEVISION, LLC,)

Plaintiffs,)

vs.)

YOUTUBE, INC., YOUTUBE, LLC,)
and GOOGLE, INC.,)

Defendants.)

THE FOOTBALL ASSOCIATION PREMIER)
LEAGUE LIMITED, BOURNE CO., et al.,)
on behalf of themselves and all)
others similarly situated,)

Plaintiffs,)

vs.)

YOUTUBE, INC., YOUTUBE, LLC, and)
GOOGLE, INC.,)

Defendants.)

VIDEOTAPED DEPOSITION OF JAWED KARIM
PALO ALTO, CALIFORNIA
TUESDAY, JUNE 9, 2009

JOB NO. 16798

Figueira Decl. Tab

65

65-15307-07-0000

KARIM, JAWED

65-0002

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

10:27:23 go at it a different way.

10:27:24 When -- when YouTube was first starting up,

10:27:32 I take it there were three founders; is that

10:27:35 correct?

10:27:35 A. Yes.

10:27:38 Q. And you were one of the three; correct?

10:27:41 A. Uh-huh.

10:27:43 Q. And the second founder was named Chad

10:27:46 Hurley; correct?

10:27:47 A. Yes.

10:27:48 Q. And the third founder was Mr. Chen, Steven
10:27:53 Chen?

10:27:53 A. Uh-huh.

10:27:54 Q. Did you know all three of these gentlemen
10:27:56 from PayPal?

10:27:58 MR. PAGE: Two.

10:27:58 MR. BASKIN: Strike that. You're
10:28:00 absolutely right.

10:28:01 BY MR. BASKIN:

10:28:01 Q. Do you know the other two gentlemen from
10:28:03 PayPal?

10:28:04 A. Yes, uh-huh.

10:28:05 Q. And they'd worked with you at PayPal at the
10:28:10 time?

KARIM, JAWED

65-0003

1

2 10:28:10 A. I think Chad actually had -- had left
3 10:28:22 PayPal that -- before that time.

4 10:28:26 Q. And "before," you mean on the sale of
5 10:28:34 PayPal?

6 10:28:34 A. Um, or he had left PayPal before I was
7 10:28:38 working with them on YouTube.

8 10:28:40 Q. And were either of them involved in Trepia
9 10:28:43 with you?

10 10:28:47 A. Um.

11 10:28:47 MR. INGBER: Objection, vague and
12 10:28:54 ambiguous.

13 10:28:54 THE WITNESS: Let's see. Actually, Chad
14 10:28:56 did design the logo and the Web site for Trepia.

15 10:29:00 BY MR. BASKIN:

16 10:29:01 And was he -- you mentioned that there was
17 10:29:03 a second cofounder of Trepia. Was -- was Chad that
18 10:29:09 second person?

19 10:29:09 A. No, he was not.

20 10:29:10 Q. He was just paid as a -- a designer?

21 10:29:14 MR. PAGE: Objection --

22 10:29:15 THE WITNESS: Yeah, he -- he was paid
23 10:29:18 one -- a one-time payment for the design.

24 10:29:20 BY MR. BASKIN:

25 10:29:20 Q. What was the name of the other founder of